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Before the
Federal Communications Commission
Washington, D.C. 20554

SEP - 3 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

)

)

Access Charge Reform

)

CC Docket No. 96-262

**REPLY
OF THE
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA) respectfully submits its reply to
oppositions filed August 18, 1997 in the above-referenced proceeding.

I. RETAIL MARKETING EXPENSES SHOULD BE RECOVERED FROM ALL LINES.

The majority of parties supported USTA's request that the Commission allow LECs to
recover marketing expenses from all lines.¹ As Ad Hoc observed, "USTA has identified a legitimate
problem...Because Account 6610 marketing expenses are incurred selling all types of subscriber
lines, it is most appropriate to recover those expenses from all subscriber lines...the Ad Hoc
Committee supports both USTA's position that recovery of marketing expenses should be more
equitable and USTA's proposed method of recovery of these costs."² Sprint agreed noting that
"USTA's approach to recovery of these costs is preferable to that proposed by AT&T. It is unfair to
saddle only certain customers with the retail expense that properly should be borne by all

¹Ad Hoc at 3-5, Sprint at 1-2, Bell Atlantic at 11, Ameritech at 2, U S WEST at 5,
Southern New England Telephone at 1, and BellSouth at 2.

²Ad Hoc at 4.

customers.”³

Only one party opposed USTA’s recommendation. MCI claims that there is insufficient evidence to support USTA’s proposal and that it does not adhere to the principle of cost-causation. MCI is incorrect on both claims.

As Bell Atlantic explained in its opposition, marketing functions and associated costs are incurred for all services and all customers, including access customers, regardless of the number of lines a customer purchases.⁴ Bell Atlantic provided data showing the allocation of Account 6610 among various service groups. Appended hereto, USTA has expanded that study to include nine of the price cap LECs. The study shows that the marketing expenses for residential and small business customers are only slightly lower than those incurred for large business customers. Contrary to MCI’s assertions, the study also shows that marketing expenses are incurred which directly benefit interexchange carriers (IXCs). IXCs also benefit indirectly from marketing of local services which enable and encourage long distance calling.

In addition, Bell Atlantic provided data regarding the marketing for value-added services and optional calling plans. Again, USTA expanded that study to provide data for five price cap LECs. This study, also appended hereto, shows that LECs actively market to all customers.⁵ Particularly in the case of value-added services, marketing activities are directed at all customers since all customers can opt for many such services.

³Sprint at 2.

⁴Bell Atlantic at 11-14.

⁵Only 14.7 percent of residential customers purchase additional lines according to the Commission’s “Trends in Telephone Service”, March, 1997.

Retail marketing expenses represent real costs that are incurred in the provision of services to all markets and customer segments, including the costs LECs incur to market access to IXCs. There is no evidence on the record which supports limiting recovery to only multi-line business and non-primary residence lines. The Commission should grant USTA's petition.

II. THE COMMISSION SHOULD APPLY THE PICC ON CENTREX LINES TO REFLECT TRUNK EQUIVALENCY.

Again, the majority of parties supported USTA's proposal to modify the application of the PICC on Centrex lines and permit LECs the flexibility to reflect trunk equivalency when calculating and assessing the PICC through the use of a line to trunk equivalency relationship or to assess the PICC on Network Access Registers instead of on station lines.⁶ As Ad Hoc observes, "If the PICC is imposed on a per-line basis, Centrex customers will bear a much greater share of the burden than comparably sized PBX customers for recovery of the total costs for which multi-line subscribers are responsible....Such a disparity is not technology neutral. It will undermine the efficiencies available to Centrex customers and create serious market distortions. Moreover, application of the PICC on a per-line basis to Centrex customers violates the principles of cost causation because the revenues it will generate are unrelated to the cost of the facilities to which the charge is applied."⁷ Despite the claims of AT&T, Time Warner and TCG, the scope and nature of the inequity among Centrex and PBX users are underscored in the comments of Boston University and the National Centrex Users Group.

⁶Ad Hoc at 9-11, American Petroleum Institute at 9, Ameritech at 2, Bell Atlantic at 14, Boston University at 1, National Centrex Users Group at 3, Southern New England Telephone at 1 and U S WEST at 4.

⁷Ad Hoc at 10-11.

There is no justification for requiring Centrex customers to “shoulder a bigger burden” as suggested by Time Warner.⁸ The PICC does not perform the same function as the SLC. There is simply no legal or policy basis to substantiate discriminating against Centrex customers in applying the PICC.

USTA’s recommendation will not provide an advantage to Centrex customers.⁹ It merely provides a way for the Commission to preserve Centrex as a competitive alternative to PBX. USTA urges the Commission to adopt its proposal regarding the application of the PICC on Centrex lines.

III. THE X FACTOR SHOULD NOT BE APPLIED TO UNIVERSAL SERVICE CONTRIBUTIONS.

While, several parties commented on USTA’s proposal regarding the recovery of universal service obligations, none of the parties provide any justification as to why it should not be granted.¹⁰

The American Petroleum Institute (API) states that incumbent LECs should be denied recovery of their universal service fund contributions through an exogenous adjustment.¹¹ Without an exogenous change, however, LECs will be unable to recover any universal service contributions. IXC and other non-regulated entities are free to pass on their universal service

⁸Time Warner at 8.

⁹TCG at 2.

¹⁰Competitive Policy Institute (CPI), in a combined opposition, argues that the Commission should grant AT&T’s request for reconsideration of the Price Cap Order in CC Docket No. 94-1. CPI raises no new arguments to support AT&T’s position. USTA hereby incorporates its opposition to AT&T’s petition filed August 18, 1997 in response to CPI.

¹¹ API at 4-6.

contributions to their customers if they so choose. Contrary to API's assertion, preventing LEC recovery of universal service obligations will not meet the stated objective of the Commission and the Joint Board that universal service be funded on a competitively neutral basis.

MCI contends that full exogenous recovery provides a guarantee that other contributors do not have.¹² MCI supports imposing the productivity factor on LEC contributions. As USTA pointed out in its petition, this will prevent full recovery of LEC contributions because the exogenous increase will be subject to a yearly productivity reduction. Of course, productivity growth has no relationship to the fixed universal service contribution. Contrary to MCI's claim, exemption of universal service contributions from the application of the productivity factor simply gives LECs the same opportunity as other contributors which are not subject to price regulation to fully recover their obligations.

AT&T states that if the Commission elects not to adopt a mandatory end-user surcharge, it opposes USTA's proposal to shield universal service contributions from X factor reductions.¹³ AT&T admits that even though the effect of the X factor will reduce the LECs' recovery below their universal service obligations, the LECs will somehow be able to "make it up in volume."¹⁴ AT&T provides no substantive basis for this conclusion. The Commission should not base its decisions on AT&T's unsupported predictions regarding LEC demand growth and LECs should not be singled out from all other universal service contributors and

¹² MCI at 17-18.

¹³ AT&T at page 17

¹⁴ AT&T at pages 17-18

be uniquely required to fund their universal service obligations solely from the growth in demand for their services. The LECs' universal service funding obligation is a mandatory regulatory requirement and should be reflected as an exogenous increase that fully recovers the amount of the obligation. There should be no reduction due to the application of the X factor.

IV. THE USF EXPENSE ADJUSTMENT SHOULD NOT BE ELIMINATED.

Sprint supported USTA's proposal to allow non-rural LECs, on an interim basis, to reduce interstate access charges by an amount equal to the interstate support received from the federal fund less the amount of Part 36 interstate high cost support received as of December 31, 1998. Sprint observed that the Commission's decision will result in unrecovered intrastate loop costs and notes that it too raised this issue in its petition for reconsideration filed in CC Docket No. 96-45.¹⁵ As USTA explained, this occurs because the dollar-for-dollar rate reduction required for the new universal service mechanism receipts fails to account for the loss of existing USF support.

The Competitive Policy Institute (CPI) states that the loss of revenues is speculative and proposing a solution is premature at this time.¹⁶ To the contrary, the losses outlined by USTA are not speculative and will materialize on January 1, 1999 if the adjustment is not retained. CPI further states that this is solely a state issue. While the impact of the Commission's decision will result in unrecovered intrastate loop costs, the revenue shortfall is a direct result of the Commission's decision that reduces the amounts funded in the interstate jurisdiction.

¹⁵Sprint at 7.

¹⁶CPI at page 10

Therefore, the Commission should continue to allow recovery of these amounts at least for a transition period.¹⁷

AT&T also opposes full recovery of these universal service costs,¹⁸ based on its assumption that all subsidies are recovered in access charges, so that any monies received from the universal service fund should be offset by corresponding access decreases. AT&T's assumption is not correct. Currently, all subsidies are not recovered through access charges. Part of the funding of universal service comes from the existing fund. These amounts should continue from the new universal service fund with any reductions limited to universal service receipts in excess of these amounts.

V. THE COMMISSION SHOULD REJECT MCI'S PROPOSALS REGARDING BILLING OF THE PICC.

USTA opposes MCI's proposals regarding the billing of the PICC in arrears and on a pro-rated basis.¹⁹ Since the PICC is assessed on a per-line basis and the number of lines is known in advance, billing of the PICC should also be in advance.

MCI notes that billing in arrears would be consistent with billing for the common line charge and the universal assessment collected from IXCs. However, billing the CCL charge in arrears was appropriate because the minutes of use on which the billing was based were not known in advance. Similarly, with the universal assessment there is a lag in the collection of data upon which the billing is based of over a year which makes billing in arrears necessary.

¹⁷See, USTA Reply, CC Docket No. 96-45, September 3, 1997.

¹⁸AT&T at page 16.

¹⁹MCI at 5-6.

There are no similar reasons to justify billing the PICC in arrears. In fact, billing of the flat-rated PICC in advance would be consistent with the advance billing of flat-rated recurring charges.

MCI claims that there will be a double payment in the transition month which can only be avoided by billing in arrears. However, this is not the case. A double payment would only occur if the monthly payment was made twice. There is no double payment in the transition month since the payment reflects two separate months.

MCI claims that payment in arrears is necessary to prevent IXC's from paying the PICC on customers they may not retain and that pro-rating is necessary to ensure that the PICC is based on the number of days in a month when the customer is serviced by the IXC. This will only add unnecessary complexity to billing systems. There will also be instances in which IXC's will be advantaged when they obtain customers mid-month for which they did not pay the PICC in advance.

MCI's proposals requesting that the Commission specify the level of billing detail, including line counts, class of customer, trunk level detail, etc., should also be rejected.²⁰ Given the different carrier billing systems, such detail may not be uniformly available in all systems. Changes will necessitate administrative costs. LECs should be permitted to make the business decisions necessary to ensure that the IXC's are paying the applicable charges required by the Commission.

²⁰MCI at 7.

VI. THE COMMISSION SHOULD REJECT MCI'S INTERPRETATION THAT ONLY THE RESIDUAL TIC CAN BE RECOVERED THROUGH THE PICC.

MCI also argues that only the “residual interconnection charge” revenues may be recovered in the PICCs and that these revenues exclude revenues that are to be reassigned on a cost causative basis to facilities-based charges in the future.²¹ MCI’s interpretation of the Order is incorrect.

MCI references paragraph 235 of the Order as defining the “residual interconnection charge” to exclude service related TIC costs. However, the Commission does not define the “residual interconnection charge” in that paragraph. In fact, the words “residual interconnection charge” do not even appear in that paragraph. That paragraph merely discusses the procedures for targeting price cap productivity reductions to the TIC. The Commission limits such targeting to minimize the risk of eliminating recovery of facilities-based TIC costs through such reductions. The Commission requires the LECs to compute their anticipated “residual” TIC amount by excluding revenues that are expected to be reassigned on a cost causative basis to facilities-based charges.

MCI’s definition of the term “residual interconnection charge” revenues, which excludes service-related costs, would prevent the LECs from recovering service-related costs from either the per-minute residual TIC or the PICC, since both are designed to recover “residual interconnection charge revenues”.²² As a result, LECs would not be able to recover the two-thirds of tandem switching costs that the Commission decided to transition to tandem

²¹MCI at 13.

²²Compare Section 69.153(a) with Section 69.155(a)(1)(b) of the Commission’s rules.

switching transport rates over two years.²³ Clearly, this is not what the Commission intended and MCI's interpretation should be rejected.

VII. CONCLUSION.

USTA urges the Commission to adopt its petition for reconsideration and/or clarification.

Respectfully submitted,

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September 3, 1997

²³Order at ¶ 218.

**PRICE CAP LEC's
1996 MARKETING EXPENSE, COST DISTRIBUTION
BY SERVICE GROUP**

SERVICE GROUP	% of TOTAL
CONSUMER	21.5%
BUSINESS	52.5%
CARRIER SERVICES	9.0%
ALL OTHERS	17.0%
TOTAL	100.0%

* Aggregate Regulated Expense for:
Ameritech, Bell Atlantic, BellSouth,
Cincinnati Bell, Citizens, GTE, SBC,
SNET, U S WEST

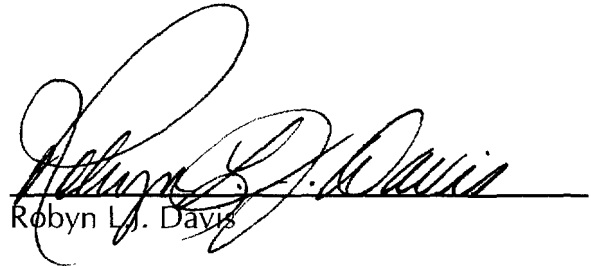
PRICE CAP LEC VALUE ADDED SERVICES & OPTIONAL CALLS

	% of TOTAL Lines
RESIDENTIAL:	
Lines w/1 or more VAS	58.2%
Lines w/O VAS	41.8%
Total Lines	100.0%
SINGLE LINE BUSINESS:	
Lines w/VAS or OCP	33.4%
Lines w/O VAS or OCP	66.6%
Total Lines	100.0%

* Composite for: Ameritech, Bell Atlantic,
BellSouth, Cincinnati Bell, Citizens, SBC

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on September 3, 1997 the Reply of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


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